

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
--	---

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran*, 1:18-cv-12370 (GBD) (SN))

**NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENT
FOR DAMAGES FOR ECONOMIC LOSSES FOR THE ESTATE OF GEOFFREY E. GUJA**

(CHAIRNOFF/IRAN III)

PLEASE TAKE NOTICE that, by and through her undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of Joseph Peter Drennan executed on August 31, 2022 (the “Drennan Declaration”), together with the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, Plaintiff Debra Guja, as representative of the Estate of Geoffrey E. Guja, who was a New York City firefighter killed in the in the terrorist attacks on September 11, 2001, respectfully moves this Court for an Order awarding:

- (1) the Estate of Geoffrey E. Guja, on behalf of all survivors and all legally entitled beneficiaries and family members of the decedent, an award of compensatory damages for economic losses in the amount of \$2,891,993; and
- (2) prejudgment interest on such damages at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (3) permission for Plaintiff Debra Guja to seek punitive damages, or other appropriate damages for the Estate of Geoffrey E. Guja at a later date; and
- (4) permission for all other *Chairnoff/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; and
- (5) such other and further relief as this Honorable Court deems just and proper.

Plaintiff's request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on October 5, 2021 (ECF 64 in 18-cv-12370 and ECF 7173 in 03-MDL-1570).

Dated: August 31, 2022
White Plains, New York

FLEISCHMAN BONNER & ROCCO LLP

By: /s/ James P. Bonner
James P. Bonner (jbonner@fbrllp.com)
Patrick L. Rocco (procco@fbrllp.com)
Susan M. Davies (sdavies@fbrllp.com)
81 Main Street, Suite 515
White Plains, New York 10601
Telephone: 646-415-1399

Joseph Peter Drennan (admitted *pro hac vice*)
218 North Lee Street, Third Floor
Alexandria, Virginia 22314-2631
Telephone: (703) 519-3773
Telecopier: (703) 997-2591
Mobile: (540) 226-0777
joseph@josephpeterdrennan.com

Patrick M. Donahue (admitted *pro hac vice*)
P. Joseph Donahue (admitted *pro hac vice*)
THE DONAHUE LAW FIRM, LLC
18 West Street
Annapolis, MD 21401
Telephone: (410) 280-2023
pmd@thedonahuelawfirm.com
pjd@thedonahuelawfirm.com

P. York McLane (admitted *pro hac vice*)
LAW OFFICE OF P. YORK MCLANE
14015 Park Dr., Ste. 111
Tomball, Texas 77377
yorkmclane@yahoo.com

***Counsel for Plaintiff Debra Guja, as Personal
Representative of the Estate of Geoffrey E. Guja***